

From: [PARRETT Kevin](#)
To: [Grandinetti, Cami](#)
Cc: [Zhen, Davis](#); [Robinson, Deborah](#)
Subject: RE: language to consider
Date: Saturday, February 27, 2016 10:27:11 PM
Attachments: [State Edits.docx](#)

Cami. I worked off your version Attached are the State's requested edits.

-Kevin

From: Grandinetti, Cami [Grandinetti.Cami@epa.gov]
Sent: Thursday, February 25, 2016 12:53 PM
To: PARRETT Kevin
Cc: Zhen, Davis; Robinson, Deborah
Subject: language to consider

My language—built off what I received from performing parties
EPA expects to work with potentially responsible parties to develop an implementation plan for completing cleanup at Portland Harbor and will likely manage the Portland Harbor cleanup by dividing the site into SMAs or groups of SMAs for purposes of design and construction, based on prioritization of significant source and risk areas, logistics or sequencing of construction (including the potential for resuspension of contaminants during construction), efficiency or other factors. EPA may use a variety of administrative tools, including entering into consent decrees with different parties to expedite and complete remedy implementation.
The implementation strategy will consider how to sequence cleanup and will likely require collection of additional data. Sequencing of cleanup will need to consider impacts of upstream contamination, proximity to other areas of contamination not being addressed and how the cleanup action fits into the final remedy.

From Silvina

“Due to the vast size of the site and the breadth of contamination, implementation of the preferred alternative may need to be conducted in phases and/or work sequenced. Post remedy selection activities will include planning for remedy implementation to consider, at a minimum, source control actions, recontamination, scope (size) of the actions across the site, impacts to the river users and the community, seasonal weather impacts, fish windows and responsible party participation. EPA has the discretion to implement the work in phases or divide the site into Operable Units, and/or sequence the cleanup as appropriate to implement the actions effectively and efficiently. Nevertheless, this document proposes/selects the final action that addresses all the risks posed by the site.”

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